

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUE ZHANG,)	
)	
Plaintiff,)	
)	
v.)	C.A. NO. 04-12735PBS
)	
SHRAGA N. GOLDBERG, M.D.,)	
Defendants.)	
)	

**INITIAL DISCLOSURES OF THE DEFENDANT SHRAGA N. GOLDBERG, M.D.
PURSUANT TO FED. R. CIV. P. 26(a)(1) and LOCAL RULE 26.2**

The defendant, Shraga N. Goldberg, M.D., by and through his attorneys, respectfully provide the following initial disclosures pursuant to Fed. R. Civ. P. 26(a) and Local Rule 26.2:

I. WITNESSES:

The following individuals who are not planned to be called solely for impeachment may have discoverable information relevant to this matter:

- Jue Zhang
- Jue Zhang's husband
- Shraga N. Goldberg, M.D.
- Michael Goldfinger, M.D.
- The plaintiff's subsequent treating physicians
- Any witness listed by the plaintiff in their Automatic Disclosure or any document

The defendants specifically reserve the right to supplement this list with the names of any other individuals who are identified at a later time.

II. DOCUMENTS

The following documents may be relevant to this matter:

- The Medical records and X-rays of the plaintiff, which are being gathered by Authorizations and copies of anything received are provided to the plaintiff.

The defendant has no knowledge of any other documents that are responsive to the disclosure requirements of Fed. R. Civ. P. 26(a)(1) at this time. The defendant reserves its right to supplement this response throughout the course of discovery.

IV. INSURANCE

The defendant is covered through a policy of insurance through Risk Management Foundation in the amount of \$5M/\$10M.

The Defendant,
SHRAGA N. GOLDBERG, M.D.,
By his attorney,

/s/ Jennifer Boyd Herlihy
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